

### Remarks

Applicant respectfully requests reconsideration of this application as amended.

Claims 1, 6, 7, 23 and 26 have been amended. No claims have been cancelled. Therefore, claims 1-3, 5-15 and 18, 19 and 21-28 are presented for examination.

Claim 6 stands rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant submits that claim 6 has been amended to appear in proper condition for allowance.

Claims 1, 7, 23, and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tremaine (U.S. Patent No. 6,775,751) in view of Dye et al. (U.S. Patent No. 6,879,266) and Goldberg (U.S. Patent No. 7,035,656). Applicant submits that the present claims are patentable over Tremaine in view of Dye and Goldberg.

Tremaine discloses a method and structure for reducing access latency and contention in a processing. The method detects when the amount of available memory is outside a prescribed range, and responsively selects data blocks for compression (to add to the available memory,) or decompression (to use surplus available memory for uncompressed data,) until the amount of available memory is within the prescribed range. When data blocks are compressed, a DOC is determined and stored as an attribute in the directory entry associated with the data block. A most recently used list of recent data block addresses prevents those, as well those data blocks with poor DOC attributes, from being selected for recompression. All zero data blocks are detected to avoid standard compression/decompression overhead. See Tremaine at Abstract.

Dye discloses compressing data with a fixed compression ratio. See Dye at Col. 33, ll. 55-62.

Goldberg discloses a network controller for controlling a message over a communication network constantly monitors actually transmitted message from or to a particular user. If the controller determines a particular phrase is transmitted more than a predetermined number of times, the controller updates support data and transmits the data in a compressed format with support data. The network controller may send an updated support data in response to a request from user equipment. See Goldberg at Abstract.

Claim 1 of the present application recites a number of dictionary elements in a compression block being automatically derived from a number of leading bits in a string of data. Applicant submits that Tremaine, Dye and Goldberg all fail to disclose or suggest such a feature. Because Tremaine, Dye and Goldberg each fail to disclose or suggest a number of dictionary elements in a compression block being automatically derived from a number of leading bits in a string of data, any combination of Tremaine, Dye and Goldberg would not disclose or suggest such a feature. Accordingly, claim 1, and its dependent claims, is patentable over a combination of Tremaine, Dye and Goldberg.

Independent claims 7, 23 and 26 include limitations similar to those recited in claim 1. Thus, claims 7, 23 and 26, and their respective dependent claims, are patentable over a combination of Tremaine, Dye and Goldberg.

Claims 2-3, 5-6, 8-9, 11-12, 24-25, and 27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tremaine in view of Dye, and Goldberg as applied to claims 1, 7, 23, and 26 above, and further in view of Castelli et al. (U.S. Patent No. 6,847,315).

Applicant submits that the present claims are patentable over Tremaine, Dye and Goldberg even in view of Castelli.

Castelli discloses a method and structure that stores and/or transmits and receives data in compressed form. Retrieval latencies are reduced by selectively transmitting a portion of the data in uncompressed form. When the apparatus is part of a computer architecture supporting main memory compression, a selected L2 cache line belonging to the unit of main memory compression is kept uncompressed. To minimize decompression latency, the uncompressed L2 cache line is stored with the compressed-memory directory. Alternatively, the uncompressed L2 cache line is stored in the compressed memory together with the rest of the memory compression unit it belongs to. See Castelli at Abstract.

Nevertheless, Castelli does not disclose or suggest a number of dictionary elements in a compression block being automatically derived from a number of leading bits in a string of data. As discussed above, Tremaine, Dye and Goldberg do not disclose or suggest such a feature. Therefore, any combination of Tremaine, Dye, Goldberg and Castelli would not disclose or suggest the feature. Thus, the present claims are patentable over a combination of Tremaine, Dye, Goldberg and Castelli.

Claims 13-14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tremaine in view of Dye, and Goldberg and further in view of Castelli, and further in view of Franaszek et al. (U.S. Patent No. 5,729,228). Applicant submits that the present claims are patentable over a combination of Tremaine, Dye, Goldberg, Castelli and Franaszek because each reference fails to disclose or suggest a number of dictionary elements in a compression block being automatically derived from a number of leading bits in a string of data.

Claims 15, 19-21 and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Dye in view of Goldberg (U.S. Patent No. 7,035,656). Applicant submits that the present claims are patentable over Dye in view of Goldberg.

Claim 15 of the present application recites receiving a fixed offset compressed data block having a plurality of dictionary elements and compressed symbols. Applicant submits that neither Dye nor Goldberg disclose or suggest *a fixed offset compressed data block*. Thus, the combination of Dye and Goldberg does not disclose or suggest all of the limitations of claim 15, or its dependent claims.

Independent claim 19 includes limitations similar to those recited in claim 15. Thus, claim 19, and its dependent claims, are also patentable over Dye in view of Goldberg.

Claims 18 and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Dye in view of Goldberg, and further in view of Castelli. Applicant submits that any combination of Dye, Goldberg and Castelli would fail to disclose or suggest a fixed offset compressed data block having a plurality of dictionary elements and compressed symbols. Therefore, the present claims are patentable over the combination of Dye, Goldberg and Castelli

Applicant respectfully submits that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicant respectfully requests the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP



Date: February 6, 2008

---

Mark L. Watson  
Reg. No. 46,322

1279 Oakmead Parkway  
Sunnyvale, California 94085-4040  
(303) 740-1980